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LP; Countrywide Capital Markets, LLC; Countrywide
14 Securities Corporation; CWALT, Inc.; CWABS, Inc.,
CWHEQ, Inc., CWMBS, Inc., and N. Joshua Adler

15 *[Additional Counsel on Signature Page]*

16 **UNITED STATES DISTRICT COURT**
17 **CENTRAL DISTRICT OF CALIFORNIA**

18 In re COUNTRYWIDE FINANCIAL
19 CORP. MORTGAGE-BACKED
20 SECURITIES LITIGATION CASES

Case No. 11-ML-02265-MRP (MANx)

21 **STIPULATION REGARDING**
22 **SCHEDULE FOR MOTIONS TO**
23 **DISMISS AMENDED COMPLAINTS**

Courtroom: 12
Judge: Hon. Mariana R. Pfaelzer

24 THRIVENT FINANCIAL FOR
25 LUTHERANS, et al.
Plaintiff,

26 v.

27 COUNTRYWIDE FINANCIAL
CORPORATION, et al.,
28 Defendants.

Case No. 11-CV-07154-MRP (MANx)

DEXIA HOLDINGS, INC., et al.,
Plaintiffs,

v.

COUNTRYWIDE FINANCIAL
CORPORATION, et al.,
Defendants.

Case No. 11-CV-07165-MRP (MANx)

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1 WHEREAS, on February 17, 2012, this Court issued orders granting in part
2 the motions to dismiss the original complaints in *Dexia Holdings, Inc., et al. v.*
3 *Countrywide Financial Corporation, et al.*, Case No. 11-CV-07165-MRP (MANx)
4 (“*Dexia*”) and *Thrivent Financial for Lutherans, et al. v. Countrywide Financial*
5 *Corporation, et al.*, Case No. 11-CV-07154-MRP (MANx) (“*Thrivent*”), and
6 granted the *Dexia* and *Thrivent* plaintiffs leave to file amended complaints within 21
7 days of those orders;

8 WHEREAS, on March 9, 2012, the *Dexia* and *Thrivent* plaintiffs each filed
9 amended complaints (the “Amended Complaints”) with the Court in their respective
10 cases;

11 WHEREAS, several of the defendants named in *Dexia* and *Thrivent* intend to
12 move to dismiss the Amended Complaints;

13 WHEREAS, pursuant to Federal Rules of Civil Procedure 15(a)(3) and
14 5(b)(2)(E), defendants’ responses to the Amended Complaints in *Dexia* and *Thrivent*
15 (as to those defendants named in each case) are currently due on March 26, 2012;

16 WHEREAS, the parties agree that good cause exists to briefly extend the date
17 by which the anticipated motions to dismiss the Amended Complaints are due;

18 WHEREAS, the parties further agree that no answers to the Amended
19 Complaints in *Dexia* and *Thrivent* should be due until the Court resolves the
20 anticipated motions to dismiss;

21 NOW THEREFORE, the parties hereby stipulate as follows:

22 1. Defendants shall file and serve any motions to dismiss the Amended
23 Complaints in the cases in which they are defendants no later than March 30, 2012;

24 Plaintiffs shall file and serve their papers in opposition to the motions to
25 dismiss the Amended Complaints no later than April 23, 2012.

26 2. Defendants shall serve and file their reply papers in support of the
27 motions to dismiss the Amended Complaints no later than May 4, 2012.

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3. Defendants' answers to the Amended Complaints in the cases in which they are defendants shall be due twenty-one (21) days after the Court decides the motions to dismiss in that case, or twenty-one (21) days after the filing of any further amended complaint in response to such order, whichever is later.

IT IS SO STIPULATED.

Dated: March 22, 2012	<p>Defendants Countrywide Financial Corp., Countrywide Home Loans, Inc., Countrywide Home Loan Servicing, L.P., Countrywide Capital Markets, LLC, Countrywide Securities Corp., CWALT, Inc.; CWABS, Inc., CWHEQ, Inc., and CWMBS, Inc., and N. Joshua Adler</p> <p>By their attorneys,</p> <p><u>/s/ Brian E. Pastuszewski</u> Brian E. Pastuszewski (<i>pro hac vice</i>) Lloyd Winawer (State Bar No. 157823) Inez H. Friedman-Boyce (<i>pro hac vice</i>) Brian C. Devine (State Bar No. 222240) Caroline H. Bullerjahn (<i>pro hac vice</i>)</p> <p><i>With respect to Mr. Adler, Signing as to Dexia Only</i></p>
Dated: March 22, 2012	<p>Defendants Bank of America Corp., NB Holdings Corporation, and BAC Home Loans Servicing, L.P.</p> <p>By their attorneys,</p> <p><u>/s/ Matthew Close</u> Matthew Close (SBN 188570) mclose@omm.com O'MELVENY & MYERS LLP 400 South Hope Street Los Angeles, CA 90071 Telephone: 213-430-7213 Facsimile: 213-430-6407</p> <p>Jonathan Rosenberg (<i>pro hac vice</i>) William Sushon (<i>pro hac vice</i>) wsushon@omm.com O'MELVENY & MYERS LLP 7 Times Square New York, NY 10036 Telephone: 212-326-2000 Facsimile: 212-326-2061</p>

<p>1 Dated: March 22, 2012</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p>	<p>Defendant Angelo Mozilo</p> <p>By his attorney,</p> <p><u>/s/ David Siegel</u></p> <p>David Siegel (SBN 101355) dsiegel@irell.com</p> <p>A. Matthew Ashley (SBN 198235) mashley@irell.com</p> <p>Allison L. Libeu (SBN 244487) alibeu@irell.com</p> <p>IRELL & MANELLA LLP 1800 Avenue of the Stars, Suite 900 Los Angeles, CA 90067-4276 Telephone: 310-277-1010 Facsimile: 310-203-7199</p>
<p>10 Dated: March 22, 2012</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>	<p>Defendant David Sambol</p> <p>By his attorneys,</p> <p><u>/s/ Michael C. Tu</u></p> <p>Michael C. Tu (State Bar No. 186793) mtu@orrick.com</p> <p>ORRICK, HERRINGTON & SUTCLIFFE LLP 777 South Figueroa Street, Suite 3200 Los Angeles, California 90017 Telephone: 213-629-2020 Facsimile: 213-612-2499</p> <p>Michael Torpey (State Bar No. 79424) mtorpey@orrick.com</p> <p>Frank M. Scaduto (State Bar No. 271451) fscaduto@orrick.com</p> <p>ORRICK, HERRINGTON & SUTCLIFFE LLP The Orrick Building 405 Howard Street San Francisco, CA 94105 Telephone: 415-773-5700 Facsimile: 415-773-5759</p>
<p>23 Dated: March 22, 2012</p> <p>24</p> <p>25</p> <p>26</p> <p>27</p> <p>28</p>	<p>Defendant Eric P. Sieracki</p> <p>By his attorneys,</p> <p><u>/s/ David Priebe</u></p> <p>David Priebe (State Bar No. 148679) david.priebe@dlapiper.com</p> <p>DLA PIPER LLP (US) 2000 University Avenue East Palo Alto, California 94303-2248 Telephone: 650-833-2000 Facsimile: 650-833-2001</p>

	<p>Shirli Fabbri Weiss (State Bar No. 079225) shirli.weiss@dlapiper.com DLA PIPER LLP (US) 401 B Street, Suite 1700 San Diego, CA 92101 Telephone: 619-699-3650 Facsimile: 619-764-6650</p> <p>Signing as to Dexia Only</p>
<p>Dated: March 22, 2012</p>	<p>Defendants Ranjit Kripalani and Jennifer S. Sandefur</p> <p>By their attorneys,</p> <p><u>/s/ Joshua G. Hamilton</u> William F. Sullivan (State Bar No. 078353) williamsullivan@paulhastings.com Joshua G. Hamilton (State Bar No. 199610) joshuahamilton@paulhastings.com Jennifer Q. Doan jenniferdoan@paulhastings.com PAUL HASTINGS LLP 515 South Flower Street, 25 Floor Los Angeles, CA 90071 Telephone: 213-683-6285 Facsimile: 213-996-3252</p> <p>Signing as to Dexia Only</p>
<p>Dated: March 22, 2012</p>	<p>Plaintiffs Thrivent Financial for Lutherans, Thrivent Life Insurance Company, Thrivent Balanced Fund, Thrivent Core Bond Fund, Thrivent Income Fund, Thrivent Limited Maturity Bondfund, Thrivent Balanced Portfolio, Thrivent Bond Index Portfolio, Thrivent Limited Maturity Bond Portfolio, Thrivent Financial Defined Benefits Plan Trust, Thrivent Financial For Lutherans Foundation, Plaintiffs Dexia Holdings, Inc., FSA Asset Management LLC, Dexia Crédit Local, New York Branch, New York Life Insurance Co., New York Life Insurance and Annuity Corp., The MainStay Funds, MainStay VP Series Fund, Inc., Teachers Insurance and Annuity Association of America, TIAA-CREF Life Insurance Co., TIAA Global Markets, Inc., College Retirement Equities Fund, and the TIAA-CREF Funds</p>

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By their attorneys,

/s/ Timothy DeLange

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PROOF OF SERVICE

I am employed in the County of Los Angeles, California. I am over the age of 18 and not a party to the within action. My business address is 601 South Figueroa Street, 41st Floor, Los Angeles, California, 90017.

On **March 22, 2012**, I served the following documents on the persons on the attached service list as follows:

STIPULATION REGARDING SCHEDULE FOR MOTIONS TO DISMISS PENDING CASES;

[PROPOSED] ORDER REGARDING SCHEDULE FOR MOTIONS TO DISMISS PENDING CASES;

- ☐ (MAIL) I placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this firm's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at Boston, MA.
- ☒ (CM/ECF Electronic Filing) I caused the above document(s) to be transmitted to the office(s) of the addressee(s) listed above by electronic mail at the e-mail address(es) set forth above pursuant to Fed.R.Civ.P.5(d)(1). "A Notice of Electronic Filing (NEF) is generated automatically by the ECF system upon completion of an electronic filing. The NEF, when e-mailed to the e-mail address of record in the case, shall constitute the proof of service as required by Fed.R.Civ.P.5(d)(1). A copy of the NEF shall be attached to any document served in the traditional manner upon any party appearing pro se."
- ☐ (EXPRESS MAIL) I placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this firm's practice for collecting and processing Express Mail for mailing. On the same day that Express Mail is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a post office, mailbox, sub-post office, substation, mail chute, or other like facility regularly maintained by the United States Postal Service for receipt of Express Mail.
- ☐ (OVERNIGHT DELIVERY) I deposited in a box or other facility regularly maintained by Federal Express, an express service carrier, or delivered to a courier or driver authorized by said express service carrier to receive documents, a true copy of the foregoing document in sealed envelopes or packages designated by the express service carrier, addressed as stated above, with fees for overnight delivery paid or provided for.

- 1 ☐ (MESSENGER SERVICE) I served the documents by placing them in an
2 envelope or package addressed to the persons at the addresses listed and
3 provided them to a professional messenger service for service. A separate
4 Personal Proof of Service provided by the professional messenger service
5 will be filed under separate cover.
- 6 ☐ (FACSIMILE) Based on an agreement of the parties to accept service by
7 fax transmission, I faxed the documents to the persons at the fax numbers
8 listed. No error was reported by the fax machine that I used. A copy of the
9 record of the fax transmission, which I printed out, is attached.
- 10 ☐ (E-MAIL or ELECTRONIC TRANSMISSION) Based on a court order or
11 an agreement of the parties to accept service by e-mail or electronic
12 transmission, I caused the documents to be sent to the persons at the e-mail
13 addresses listed. I did not receive, within a reasonable time after the
14 transmission, any electronic message or other indication that the
15 transmission was unsuccessful.

16 I declare under penalty of perjury that I am employed in the office of a
17 member of the bar of this Court at whose direction this service was made and that
18 the foregoing is true and correct.

19 Executed on **March 22, 2012**, at Los Angeles, California.

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Britani N. Selzler
(Type or print name)



(Signature)